

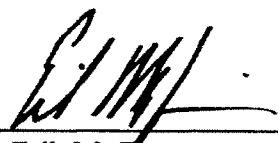
CERTIFICATE OF SERVICE

I, Erik M. Zissu, Esq., hereby certify that on March 28, 2012, I caused true and correct copies of Defendant Peter Ghavami's Reply Memorandum of Law in Support of his Motion to Sever Count Six of the Indictment to be served via FedEx and e-mail on the following counsel:

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